

EXHIBIT C

Megan Benett

From: Steven R. Pounian
Sent: Tuesday, March 2, 2021 8:54 PM
To: Jim Kreindler; Andrew J. Maloney; Megan Benett; John Fawcett
Subject: Fwd: Alp Karli

Begin forwarded message:

From: "zSarah S. Normand" <sarah.normand@usdoj.gov>
Date: March 2, 2021 at 7:11:50 PM EST
To: "Carter, Sean" <SCarter1@cozen.com>
Cc: "Vargas, Jeannette (USANYS)" <Jeannette.Vargas@usdoj.gov>, zRobert Haefele <rhaefele@motleyrice.com>, "Steven R. Pounian" <Spounian@kreindler.com>, "WTC[jgoldman@andersonkill.com]" <jgoldman@andersonkill.com>, zScott Tarbutton <starbutton@cozen.com>
Subject: RE: Alp Karli

Sean,

We have been careful not to reveal either side's communications regarding access requests. For that reason we do not feel comfortable sharing the scope of KSA counsel's access request without their consent.

However, pursuant to Paragraph 7 of the Protective Order, the FBI consents to the PECs' request to share FBI 281-283, 335-342, 1055-1072, 1114, 1128, 1295, 1297, 1370-1376, 3884-3903, and 7995-7998 with Ben Wood of Squire Patton Boggs, provided that Mr. Wood has first been provided with a copy of the FBI Protective Order, signed the acknowledgement, and provided the signed acknowledgement to you to maintain on file. Mr. Wood may in turn share the contents of the specified documents, but not the documents themselves, with Mr. Karli, provided that Mr. Karli has first been provided with a copy of the FBI Protective Order, signed the acknowledgement, and provided the signed acknowledgement to Mr. Wood to maintain on file.

Please note that the FBI has authorized you to share the pages of the joint FBI-CIA intelligence report and the FBI OIG report that mention Dallah Avco (FBI 1114 and 1128). It does not appear that the entire reports (FBI 1088-1116 and 1117-1141) would be pertinent to Mr. Karli. If you believe additional pages of those reports are pertinent, please let us know and the FBI will review those pages.

Best regards,
Sarah

-----Original Message-----

From: Carter, Sean <SCarter1@cozen.com>
Sent: Thursday, February 25, 2021 4:21 PM
To: Normand, Sarah (USANYS) <SNormand@usa.doj.gov>

Cc: Vargas, Jeannette (USANYS) <JVargas@usa.doj.gov>; Haeefe
<rhaefe@motleyrice.com>; Steven R. Pounian <Spounian@kreindler.com>;
WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Tarbutton, J. Scott
<STarbutton@cozen.com>
Subject: Re: Alp Karli

Sarah – Thanks. We expect to engage in further discussions with Mr. Karli’s counsel on the proposed deposition, and for purposes of those, we will need to know the scope of access that he has been granted. We obviously do not want to raise any documents or information for which he has not been cleared. Can you please advise us of the parameters of any access authorization, for him and his client? Thanks, Sean

Sent from my iPhone

On Feb 25, 2021, at 9:29 AM, Normand, Sarah (USANYS)
<Sarah.Normand@usdoj.gov> wrote:

****EXTERNAL SENDER****

Sean:

I am writing to confirm that FBI has responded to KSA's limited access request with regard to Mr. Wood.

Best regards,
Sarah

-----Original Message-----

From: Normand, Sarah (USANYS)
Sent: Friday, February 12, 2021 9:10 AM
To: Carter, Sean <SCarter1@cozen.com>
Cc: Vargas, Jeannette (USANYS) <JVargas@usa.doj.gov>; Haeefe
<rhaefe@motleyrice.com>; Steven R. Pounian <Spounian@kreindler.com>;
WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; Tarbutton,
J. Scott <STarbutton@cozen.com>
Subject: Re: Alp Karli

Sean,

After reviewing our records, I can confirm that KSA's counsel did make a limited access request for Mr. Wood in early January. Unfortunately, the request appears to have fallen through the cracks on our side. We will confer with FBI promptly with regard to KSA's request and respond shortly. I apologize for the oversight.

Sarah

Sent from my iPhone

On Feb 11, 2021, at 5:02 PM, Carter, Sean
<SCarter1@cozen.com> wrote:

Sarah,

Thank you for your willingness to address in short order the issue of Ben Wood's (of Squire Patton Boggs) access to FBI protected information in connection with his representation of witness Alp Karli. Given the short discovery timeline, Plaintiffs anticipate taking Mr. Karli's deposition as soon as possible, hopefully in mid-March. Accordingly, the government's urgent attention to the request is appreciated. Also, we had understood that the Kingdom already had asked the DOJ to permit Mr. Wood to view certain FBI documents. Can you let us know if that is correct? In any event, to address this request on an expedited basis, we have done our best to identify the protected documents that we anticipate to be of most relevance for Mr. Wood's consultations with Mr. Karli about appearing for a deposition (in summary, we anticipate that those will be the documents that reference Alp Karli, Dallah Avco, or Ercan). The relevant bates numbers for those documents are: FBI 281-283, 335-342, 1055-1072, 1088-1116, 1117-1141, 1295, 1297, 1370-1376, 3884-3903, 7995-7998

Finally, your request for this information prompted a dialogue among the PECs, and we are of the view this kind of detail should not be a prerequisite for providing likely witnesses and their US counsel with access to FBI material, subject to the terms of the Protective Order. We will be back to you with further thoughts on that front next week.

Thanks

Sean P. Carter
Member | Cozen O'Connor

One Liberty Place, 1650 Market Street Suite 2800 | Philadelphia,
PA 19103

P: 215-665-2105 F: 215-701-2105

-----Original Message-----

From: Normand, Sarah (USANYS) <Sarah.Normand@usdoj.gov>

Sent: Wednesday, February 10, 2021 7:56 PM

To: Carter, Sean <SCarter1@cozen.com>

Cc: WTC[jeannette.vargas@usdoj.gov]
<jeannette.vargas@usdoj.gov>; Haefele
<rhaefele@motleyrice.com>; Steven R. Pounian
<Spounian@kreindler.com>; WTC[jgoldman@andersonkill.com]
<jgoldman@andersonkill.com>; Tarbutton, J. Scott
<STarbutton@cozen.com>

Subject: Re: Alp Karli

****EXTERNAL SENDER****

Sean,

I am happy to raise this with FBI in short order, but we would need to know which specific FBI materials are at issue.

Thanks,

Sarah

Sent from my iPhone

On Feb 10, 2021, at 6:11 PM, Carter,
Sean <SCarter1@cozen.com> wrote:

Sarah and Jeanette - With apologies, I neglected to send you the email we discussed during our call last week, concerning the request for access to the FBI materials from Alp Karli's counsel. As discussed, Mr. Karli is being represented by Ben Wood from Squire Patton, who has advised that Mr. Karli is inclined to appear voluntarily for deposition.

However, Ben has requested access to the FBI materials, pursuant to the protective order, in order to make a final decision in consultation with his client. Because of the impending deadline for completing the depositions, the request is time sensitive, and we hope the government can process it in short order.

Thanks, Sean

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